

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TROY LAMONT MOORE, SR.

: CIVIL ACTION

V.

: NO. 14-3873

MARGARET McGROGAN, RN, et al.

:

MOTION OF DEFENDANT, MARGARET McGROGAN, RN FOR AN  
EXTENSION OF TIME FROM MARCH 4, 2015 TO  
MARCH 14, 2015 TO FILE HER MOTION FOR SUMMARY JUDGMENT

Margaret McGrogan, RN (hereinafter “the medical defendant”) respectfully requests that this Court grant her motion for an extension of time from March 4, 2015 to March 14, 2015 to file a Motion for Summary Judgment and states in support thereof the following:

1. On December 3, 2014 the Honorable Judge Eduardo C. Robreno (hereinafter “Judge Robreno”) set forth a scheduling order for the above captioned case setting due dates for plaintiff’s deposition (February 2, 2015) and filing of a summary judgment motion (March 4, 2015).
2. All parties, including medical defendant, have worked diligently to meet these deadlines. Defendants acquired needed records and took the deposition of plaintiff on January 16, 2015.
3. Counsel for the medical defendant have taken substantial steps toward completing her motion for summary judgment, including preparing a statement of uncontested facts, a first draft of the motion and brief which has not yet been typed and has marked exhibits.

4. The medical defendants needed this extension because their counsel, Alan S. Gold (“Gold”), has been unable to get to his office this week. Gold uses a walker because he suffers from spinal stenosis. Due to this impairment, combined with a previous incident in which he fell and broke his hip, Gold is under medical instructions not to go out or travel in the kind of icy and slippery conditions which have prevailed in the Philadelphia area this week. No one else in Gold’s firm has the knowledge of this case to prepare and edit this motion for summary judgment.

5. In addition to Gold’s absence, his long-time secretary has been out all week dealing with an unanticipated family medical emergency. Gold’s firm is small and his secretary is the only one with the skills and experience to type a lengthy and sophisticated document such as a motion for summary judgment.

6. Gold will need a minimum of one to two days in the office with his secretary to complete writing and editing medical defendant’s motion for summary judgment. However, it is not clear how soon his secretary will return from her leave of absence.

7. Gold seeks a ten (10) day extension to the deadline set by Judge Robreno, a new deadline of March 14, 2015.

8. No previous extension have been sought in this case.

9. No prejudice will occur to anyone by granting this extension of time.

10. Gold has e-mailed Assistant City Solicitor Aaron Shotland, who represents the City defendants, asking whether he agrees with this extension but has not heard back. He has written to plaintiff, but because Mr. Moore is an inmate, there is absolutely no way to contact him directly.

WHEREFORE, Margaret McGrogan, RN respectfully requests that her motion for an extension of time until March 14, 2015 to file her motion for summary judgment be granted.

GOLD & FERRANTE, P.C.

BY: /S/ ALAN S. GOLD  
ALAN S. GOLD  
Attorney for Defendant,  
Margaret McGrogan, RN

261 Old York Road, Suite 526  
Jenkintown, PA 19046  
(215)885-1118

**CERTIFICATE OF SERVICE**

I hereby certify that I have sent a true and correct copy of defendant, Margaret McGrogan, RN 's Motion for an Extension of Time to submit her Motion for Summary Judgment was sent via ECF filing on this date to the following individuals:

Troy Lamont Moore, Sr., FE-2483  
SCI-Forest  
PO Box 945  
Marienville, PA 16239-0945  
via US First Class Regular Mail

Aaron Shotland  
via ECF Filing: [aaron.shotland@phila.gov](mailto:aaron.shotland@phila.gov)

/S/ ALAN S. GOLD  
ALAN S. GOLD

DATE:      March 4, 2015